

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY
Albert Russo Standing Chapter 13 Trustee PO Box 4853 Trenton, NJ 08650 (609) 587-6888 Standing Chapter 13 Trustee
In re:
Kristen L Mauro
Debtor(s)

Case No. 25-10978 / MBK  
Hearing Date: April 23, 2025 10:00 am  
Judge: Michael B. Kaplan  
Chapter: 13

### **TRUSTEE'S OBJECTION TO DEBTOR(S) CHAPTER 13 PLAN**

Albert Russo, Standing Chapter 13 Trustee, objects to the Debtor(s) Plan for the following reason(s):

**The debtor has failed to supply the Trustee with the following document (s):**

**A copy of the last filed tax return - 2024 BY 5/15/2025**

**A copy of the homeowner's insurance renewal declaration - with proof of liability coverage**

**The Plan provides for payment on unsecured claims of less than that which would be distributed upon liquidation under Chapter 7, as prohibited by 11 U.S.C. § 1325(a)(4):**

**-There is \$144,525.43 non-exempt in the house**

**-There is \$2,200 non-exempt in electronics**

**-There is \$300 non-exempt in clothing**

**TOTAL NON-EXEMPT EQUITY \$147,025 (100% PLAN.)**

**-Need to file Pre-Confirmation Certification with Court**

WHEREFORE, Standing Chapter 13 Trustee, Albert Russo, objects to confirmation of the plan.

/s/ Albert Russo  
Albert Russo  
Standing Chapter 13 Trustee  
by: David Martin, Staff Attorney